

**Responsiveness Summary  
To Comments Made by the Environmental Protection Agency  
For**

**Proposed Air Quality Permit No. 1000158**

**El Paso Natural Gas Company  
Seligman Compressor Station**

The following comments were made by the EPA, as received on December 9, 1997.

*Comment 1: Attachment A. Section III.B.5. Permit Revision, Reopening, Revocation, and Reissuance, or Termination for Cause. Please correct this section as indicated in Comment #1 of the enclosed previous comment letter, dated November 14, 1997.*

Response: To clarify that permit reopenings do not result in resetting the five-year term, except for permit reopenings to include new applicable requirements, Section III.B.5 has been revised as follows:

- (i) Section III.B.5 has been renamed as Section III.C
- (ii) The following sentence has been added to the language:

**"Permit reopenings for reasons other than those stated in paragraph III.B.1 of this Attachment shall not result in a resetting of the five year permit term."**

*Comment 2: Attachment A. Section XIII. Reporting Requirements. Please correct this section as indicated in Comment #2 of the enclosed previous comment letter.*

Response: To clarify the reporting requirements of the permit for the source, Section XIII has been rewritten to read as follows:

**"Permittee shall comply with all of the reporting requirements of this permit. These include all of the following:**

- (i) **Compliance certifications pursuant to Attachment A, Section VII of this permit.**
- (ii) **Permit deviation reporting pursuant to Attachment A, Sections XI.A, XI.B, and XI.C of this permit.**
- (iii) **Reporting requirements listed in Attachment B, Section III of this permit."**

Note: Making this modification results in Section III.B of Attachment "B" becoming redundant. Therefore, it was deleted.

*Comment 3: Attachment A. Section XVI. Facility Change Without Permit Revision. Please correct this section as indicated in Comment #3 of the enclosed previous comment letter.*

Response: ADEQ agrees with EPA on this comment. To clarify the meaning of Section XVI, the following two changes have been made:

- (i) The last sentence of Section XVI.C has been deleted
- (ii) Section XVI.C.1 has been deleted.

With these changes, the permit does not address facility changes which would not require notification to ADEQ. ADEQ is committed to working one-on-one with various industrial source groups to develop lists of such facility changes that would not require notification.

In addition to these changes, the review process revealed that the permit shield exemption for facility changes without revisions and minor revisions had been omitted from the permit. Consequently, Section X X of Attachment A of the permit now reads as follows:

**"Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Attachment "C" of this permit. The permit shield shall not apply to any changes made pursuant to Section XV.B of this Attachment and Section XVI of this Attachment."**

*Comment 4: Attachment A. Section XVII.B. Testing Requirements. Please correct this section as indicated in Comment #4 of the enclosed previous comment letter.*

Response: To clarify the intent of the testing requirements, Section XVII has been modified to read as follows:

## **XVII TESTING REQUIREMENTS**

[A.A.C.R18-2-312]

### **A. Operational Conditions During Testing**

**Tests shall be conducted during operation at the normal rated capacity of each unit, while operating at representative**

**operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed at a lower rate. Operations during start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.**

B. Test Plan.....

*Comment 5: Attachment A. Section XX. Permit Shield. Please correct this section as indicated in Comment #5 of the enclosed previous comment letter.*

Response: Section XX has been modified to read as follows:

**"Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Attachment "C" of this permit. The permit shield shall not apply to any changes made pursuant to Section XV.B of this Attachment and Section XVI of this Attachment."**

*Comment 12: Attachment B. Section IV.B. Testing Requirements. The citation is missing from this section. It should be (A.A.C. R18-2-306.A.3). Note that previous ADEQ draft natural gas compressor station permits included a citation in the Testing Requirements section to A.A.C. R18-2-311 and 312. Because these rules were not approved into ADEQ's Title V program, the EPA suggests these sections not be cited in ADEQ Title V permits to avoid possible problems in the future.*

Response: The missing citation (A.A.C. R18-2-306.A.3) has been added to the permit. Citations to A.A.C. R18-2-311 and 312 have been removed from the permit.

*Comment 13: Attachment B. Section IV.C. Testing Requirements. As explained in Comment #9 of the enclosed previous comment letter, "alternate and equivalent test methods" must be clearly defined in the permit. This applies for all required testing, regardless of where the testing requirement is given. Because the EPA does not have a copy of the current state rules, it is unclear what is contained in Articles 9 and 11, and why an exception was made for these sections.*

Response: The Permittee has requested that they be provided the flexibility to employ other effective testing methods that meet the requirements of AAC R18-2-311(D). AAC R18-2-311(D) states that except for emissions testing required under Articles 9 and 11 of AAC Chapter 18, alternative and equivalent test methods as specified in Appendix A of 40 CFR 60 may be submitted and

approved by the Director under certain circumstances (AAC R18-2-311(D.1,D.2,D.3)). The following language has been added to the permit:

**"The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A to the Director in any test plan for approval by the Director."**

*Comment 14: Attachment C. Applicable Regulations. As described in Comment # 5 above, there are two options for obtaining a permit shield. If Section XX (Permit Shield) of Attachment A is deleted completely, then Attachment C must include language that explicitly states a permit shield is granted to the permittee. For either option, an adoption date of the version of each rule that is being shielded from must be included in Attachment C.*

*Response:* Please see Response to Comment 5. Attachment C now states : "Compliance with the terms contained in this permit shall be deemed compliance with the following federally applicable requirements **in effect on the date of permit issuance:.....**".

*Comment 15: Attachment E. Insignificant Activities. Please correct this section as indicated in Comment #11 of the enclosed previous comment letter.*

*Response:* AAC R18-2-101.54 defines an "insignificant activity" as follows:

"Insignificant activity" means an activity in an emissions unit that is not otherwise subject to any applicable requirement and which belongs to one of the following categories:

- a. Landscaping.....etc.
- b. Gasoline storage tanks.....etc.
- c. Diesel and.....etc.
- d. Batch mixers.....etc.
- e. Wet sand.....etc.
- f. Hand-held or manually operated equipment.....etc.
- g. Powder....etc.
- h. Internal...etc.
- i. Lab equipment....etc.
- j. Any other activity which the Director determines is not necessary, because of it's emissions due to size or production rate, to be included in an application in order to determine all applicable requirements and to calculate any fee under this Chapter.

From this definition, it can be seen that under Arizona rules for a unit to qualify as an insignificant activity, there should be no generally applicable requirements that the source may be subject to. This definition is different from the definition of insignificant activities under Part 70. All the activities listed under Attachment “D” of the permit have been determined not to have any applicable requirements.

*Comment 16: Technical Support Document. The technical support document should provide a clear and concise explanation of all requirements in the permit. We found most of this document to be clear and concise, but are concerned by the justification given for excluding PM and opacity monitoring requirements on the turbines engines. Instead of giving data to defend ADEQ’s decision, the technical support document refers the reader to a “preceding discussion”. While today it is relatively simple to find the “preceding discussion” in earlier technical support documents, through the years (as facilities shut down, etc.) these documents may become much less accessible. Given the small amount of data involved for justification, EPA suggests that ADEQ include the data in each permit’s technical support document. Alternatively, ADEQ can make a more specific reference to the exact permit that contains the “preceding discussion”. If this option is chosen, ADEQ must ensure that any referenced material is readily available.*

Response: ADEQ understands EPA’s concern and will make all efforts to ensure that any referenced material is readily available. However, “preceding discussion” as stated in the technical support document was meant to refer the reader back to Section II.B of the technical support document where the justification in terms of numeric data is given and not refer to any outside material as was interpreted by the EPA. A clarification has been made to specify the reference.

Comment 19: Attachment B. Section I.A. Emission Limits/Standards. The EPA is concerned about ADEQ’s omission of NSPS requirements which were included in a previous new source permit. The Title V permit is legally required to contain all applicable requirements. Because ADEQ’s installation permits are issued pursuant to SIP, all conditions in ADEQ’s installation permits are applicable and should be included in a facility’s Title V permit. For this specific facility, NSPS conditions were included in a previous installation permit and should thus be included in the Title V permit.

Alternatively, ADEQ can take the following steps to remove unwanted voluntary conditions. First, amend the previous permit to remove the unwanted voluntary conditions. Second, amend the Title V permit to reflect the changes to the previous permit. If ADEQ chooses this alternative, please explain more explicitly to the EPA why the NSPS (40 CFR 60, Subpart GG) is not applicable

the GE regenerative turbine engine.

Response: After a review of the current permit application, ADEQ has determined that the NSPS requirements for the GE turbine at the Seligman compressor station have been incorrectly applied to the unit in the past.

The GE Frame 3 gas turbine was installed in 1966 as a simple cycle turbine and as such was not subject to the provisions of any of the new source performance standards (NSPS). In 1990, EPNG installed a regenerator on the Seligman turbine. Installation of the regenerator converted the turbine from simple cycle to regenerative cycle as defined in 40 CFR 60.331 and is estimated to have increased NOx emissions. However, regenerative turbines of less than 107.2 gigajoules per hour, as is the case at Seligman, are exempt from NOx requirements pursuant to 40 CFR 60.332(l). Therefore, because there was no increase in emission of a pollutant subject to an NSPS standard, no NSPS modification occurred pursuant to 40 CFR 60.14(a). Similarly, no reconstruction as defined in 40 CFR 60.15 occurred. DEQ therefore determined that Subpart GG was not applicable.

Though the GE Frame 3 turbine of the Seligman station had been operating for a few decades, the first air quality permit was an installation permit (Permit # 55029) issued to them in 1991. This permit was to conduct a “screwdriver uprate” of the Seligman simple cycle turbine. The uprate consisted of engineering work to develop new turbine documentation and manually resetting the turbine’s firing temperature resulting in an increase in the turbine’s horsepower from 6450 to 6692 site horsepower.

In the technical support document for the installation permit no. 55029 to uprate the turbine by 292 hp, the permit engineer has stated the following in support of including the NSPS requirements:

“El Paso Station (was) originally constructed (in) 1959. But this modification is not part of a continues program of construction or modification. Therefore, (it is a ) modification (since) construction commences after 1982.”

In the technical support document for operating permit no. M251199-96, the permit engineer has stated the following in support of including the NSPS requirements:

“40 CFR 60, Subpart GG is applicable because this source is rated at 58.63 MM Btu/hr which is greater than 10 MM Btu/hr (the lower limit for NSPS applicability) and was reconstructed in 1991, which is later than October 3, 1977.”

However, a modification is “any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies” subject to certain exemptions. The “screwdriver” uprate with no capital expenditure is not a modification and is exempted under 40 CFR 60.14.e(2). Also, regenerative turbines of less than 107.2 gigajoules per hour, as is the case at Seligman, are exempt from NOx requirements pursuant to 40 CFR 60.332(l). Therefore, because of there was no increase in a pollutant subject to an NSPS standard, no NSPS modification occurred pursuant to 40 CFR 60.14(a). The uprate is also not a reconstruction as defined in 40 CFR 60.15. Based on the above discussion and stated in Technical Remarks for Permit No. 1000158, ADEQ has concluded that the turbine is not subject to NSPS.

The following comment was made by EPNG during the Public Comment period. The following response was made by ADEQ after its discussions with the EPA during the Teleconference on December 16, 1997.

*Comment: II. Compliance with permit conditions:*

*A. The first sentence of this provision should be reworded to conform to the permit shield provisions of R18-2-325:*

*The Permittee shall comply with all conditions of this permit, which sets forth all applicable requirements of Arizona’s air quality statutes and the air quality rules.*

*The existing language could be read as requiring the Permittee to comply with “all applicable requirements” which contradicts the purpose of a Class I permit.*

*Response:* ADEQ had initially agreed with EPNG on this issue. However, EPA as a part of their comments had concerns regarding the addition of this phrase. According to the EPA, the condition could be incorrectly interpreted to provide permit shield for all those requirements which have not been identified in the permit. Upon a review of our regulations, it was decided to use the language as quoted in A.A.C. R18-2-306.A.8. Therefore, there will be no change in the permit condition.

## RESPONSIVENESS SUMMARY

To EPA Comments on Proposed Title V Permit  
During Official 45-Day EPA Review Period for

El Paso Natural Gas Company

Bowie Compressor Station (Permit #1000168)  
Dutch Flat Compressor Station (Permit #1000169)  
Hackberry Compressor Station (Permit #1000165)

The following comments were made on April 22, 1998 during the official 45-day EPA Review period which ends on April 30, 1998:

### DUTCH FLAT COMPRESSOR STATION

Comment 1: *Attachment B.I. Emission Limits/ Standards. According to the technical support document, the previous permit for this facility (# 65039M1) limited the amount of natural gas (scf/hr) burned in each turbine, and in the generator engine. All conditions in installation permits and conditions in operating permits deriving from installation permits are applicable requirements and should be included in the title V permit. Even if there is no clear regulatory requirement for the inclusion of these limits in the underlying permit, they may have been included to keep a source out of certain requirements (NSR, NSPS, etc). However, it may be possible to amend the underlying permit to remove certain obsolete, extraneous or environmentally insignificant conditions. Please see EPA's attached comment on removing applicable conditions from title V by amending the underlying permit. The fuel amount limits need to be included, unless ADEQ can and does modify the underlying permit in accordance with our guidance. Note that if the fuel amount limits are included, the previous permit should be cited, and corresponding recordkeeping and reporting requirements should be added to the appropriate sections of this permit.*

Response: In a teleconference call with Erica Ruhl and Ginger Vagenas of the EPA on April 23, 1998, it was discussed that to remove requirements from previous installation permits, the old permit must be amended concurrently with the Title V permit. In addition, limitations that are being removed from previous permits should be disclosed in the public notice document.

The technical support document has been revised to include a discussion pertaining to the removal of the fuel limitation requirement. As mentioned in the technical support document, we are hereby revising the installation permit through this Part 70 renewal process.



Comment 2: *Attachment B.I.A. Natural Gas Fired Solar Simple Cycle Gas Turbines. A new permit condition (I.A.4) should be added to include the 20% opacity limit from the previous permit, as described in comment #1 above. The previous permit should be cited for this condition.*

Response: EPA agreed during the teleconference call on April 23, 1998 that because the units burn natural gas, it would be acceptable to remove the opacity limitation. As discussed in the technical support document, we are hereby revising the installation permit through this Part 70 renewal process.

Comment 3: *Attachment B.I.B. Waukesha Auxiliary Generators. A new permit condition should be added to include the 20% opacity limit from the previous permit, as described in comment #1 above. The previous permit should be cited for this condition.*

Response: See response to comment #2 above.

Comment 4: *Attachment B.I.B.2. Opacity Limitation. This permit condition limits the auxiliary generators to "40 percent opacity measured in accordance with the Arizona Testing Manual, Reference Method 9". As written, this condition could be read to imply an exclusive link between the emission limit and the method of determining compliance. Conditions in a title V permit cannot limit the types of data or information that may be used to prove a violation of any applicable requirement, i.e., restrict the use of any credible evidence. To correct this credible evidence problem, emission limits should be separated from the required method of monitoring by placing each in its respective section of the permit. Because no Method 9 tests will be required for this facility, simply removing the language referring to Reference Method 9 from the Emission Limits/Standards section will correct this problem.*

Response: ADEQ agrees with the EPA on this comment. Condition I.B.2 of Attachment B has been revised to read as follows:

"Permittee shall not cause, allow or permit to be emitted into the atmosphere from the auxiliary generators, smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes."

Comment 5: *Attachment B.I.C.1.a. Open areas, Roadways, Streets, Storage Piles or Material Handling. As written, this condition could be read to imply an exclusive link between the emission limit and the method of determining compliance. However, in this case the language linking the emission limit and the test method ("40% opacity measured by EPA Reference Method 9") is a direct quote from the SIP rule. In the context of credible evidence, language in the SIP overrides any permit language, so EPA*

*cannot require a separation of the emission limit and test method. However, the language in the permit should be revised to match the language in the SIP rule exactly. (“40% opacity measured in accordance with the Arizona Testing Manual, Reference Method 9”). We recognize this seems like a minor change, but the language “measured in accordance with” matches the language in the NSPS 40 CFR 60.8 and will improve the enforceability of the permit.*

Response: ADEQ agrees with the EPA on this comment. Condition I.C.1.a of Attachment B has been revised to read as follows:

“Visible emissions from open areas, roadways, streets, storage piles, or material handling shall not have an opacity greater than 40% measured in accordance with the Arizona Testing Manual, Reference Method 9.”

Comment 6: *Attachment B.II.A.2. Fuel Nitrogen Content. Since the waiver of the fuel nitrogen monitoring requirement is clearly explained in the technical support document, we recommend removing this condition altogether from the permit to avoid confusion for the source.*

Response: ADEQ agrees with the EPA on this comment. This section has been removed from the permit.

Comment 7: *Attachment B.III. Reporting Requirements. Reports of required monitoring must be submitted every 6 months, pursuant to A.A.C. R18-2-306.A.5.a. As described in the preamble to 40 CFR Part 70, these reports must include all recordkeeping performed in place of monitoring, i.e., (for this permit) records of dust control measures required by Section II.F.1. Please add a new provision requiring the Permittee to submit a report, at least every 6 months, of all records required under Section II.B. Records on fuel usage, which could be required as described in comment #1 above, would also be included in such reports. This citation for the new condition should be A.A.C. R18-2-306.A.5.a. For convenience, this requirement may be timed to coincide with the compliance certifications required by Section VII of Attachment A.*

Response: ADEQ agrees with the EPA on this comment. A new condition III.B has been added to the permit. Section III.B reads as follows:

“At the time the compliance certifications required by Section VII of Attachment “A” are submitted, the Permittee shall submit reports of all monitoring activities required by Section II of this Attachment performed in the six months prior to the date of the report.”

Comment 8: *Attachment B.IV.A. Testing Requirements. The previous permit required annual tests for CO. Please add this requirement, or follow the attached guidance to*

*determine if removal of this condition is possible. Also, please remove the citation to 40 CFR 60.8 since this rule only applies to performance tests required at the initial startup of equipment.*

Response: Initial performance tests performed in 1994 demonstrate that the emissions of CO for the Taurus and Centaur turbines was 0.17 lb/hr and 0.14 lb/hr, respectively. The most recent performance tests conducted in 1997 demonstrate that the emissions of CO were 0.1 lb/hr and 0.3 lb/hr, respectively. In addition, the emissions inventory for the year 1995 reported CO emissions of 8.06 tpy. In the teleconference call of April 23, 1998, EPA agreed that because there is no emission limitation for this pollutant and, based on past performance tests and emissions inventory, this condition can be removed from the permit. As mentioned in the technical support document, we are hereby revising the installation permit through this Part 70 renewal process.

Comment 9: *Initial Performance Tests. From the data in the technical support document on the initial performance tests (6/94), it appears that each turbine was only tested at one load condition. The NSPS Subpart GG (40 CFR 60.335) requires testing at four load conditions. Please either provide information on additional tests performed on 10/12/90, or add a compliance schedule to properly implement the initial performance test requirement. Also, add a schedule for submission of certified progress reports, as required by R18-2-309.5.c.iii and R18-2-309.d., respectively.*

Response: ADEQ is still evaluating our response to this comment.

## BOWIE COMPRESSOR STATION

Comment 10: *Attachment B.I.A Natural Gas Fired GE turbine and Auxiliary Engine. The language in conditions 1,2, and 3 suggests these limits apply only to the turbine engines, and not the auxiliary generator. The SIP rule (R9-3-519) says these limits apply to “stationary rotating machinery”. Per recent conversations with David Browner, current district rules define “stationary rotating machinery” as including all internal combustion engines, not just turbines. Please change conditions 1,2, and 3 to apply to stationary rotating machinery, and note in the technical support document that the auxiliary engine is considered stationary rotating machinery. Also, please remove the test method for opacity to avoid a credible evidence problem, as described in comment #4 above. Since no opacity observations are required for these sources, the test method does not need to be placed elsewhere in the permit.*

Response: ADEQ agrees with the EPA on this comment. Both the permit and the technical support document have been revised to reflect this change. In addition, the test

method for opacity was removed as described in the response to comment #4 above.

Comment 11: *Attachment B.I.B.1.a. Open Areas, Roadways, and Streets, Storage Piles, and Material Handling. Please make the correction described in comment #5 above.*

Response: ADEQ agrees with the EPA on this comment. Please see revision in response to comment #5 above.

Comment 12: *Attachment B.III. Reporting Requirements. Reports of required monitoring must be submitted every 6 months, pursuant to A.A.C. R18-2-306.A.5.a. As described in the preamble to 40 CFR Part 70, these reports must include all recordkeeping performed in place of monitoring, i.e., (for this permit) records of dust control measures required by Section II.F.1. Please add a new provision (III.D) requiring the Permittee to submit a report, at least every 6 months, of all records required under Section II.B. This citation for the new condition should be A.A.C. R18-2-306.A.5.a. For convenience, this requirement may be timed to coincide with the compliance certifications required by Section VII of Attachment A.*

Response: ADEQ agrees with the EPA on this comment. Please see revision in response to comment #7 above.

Comment 13: *Attachment B.V. Turbine Uprate to 10736 Horsepower. The first sentence states, "During the term of this permit, Permittee may uprate the existing engine to 10736 hp." Any modification of the source must be evaluated to see if any new source review requirements (or NSPS, HAP limits, etc.) are triggered. There is no authority in the title V program to allow the bypassing of such requirements. Therefore, please remove the first sentence of this section. Alternatively, this sentence may be retained if ADEQ conducts the required analysis of the proposed modification prior to the issuance of the permit. Language should be added clarifying that if a source does not begin construction within 18 months of the BACT determination, a new BACT determination would need to be made before the modification can occur. Whether or not new requirements are triggered, the analysis must be clearly documented in the technical support document if the first sentence is retained.*

Response: The technical support document has been revised to document the analysis used to determine that no new requirements are triggered.

Comment 14: *Attachment B.V.B.2. Fuel Nitrogen Content. Since the waiver of the fuel nitrogen monitoring requirement is clearly explained in the technical support document, we recommend removing this condition altogether from the permit to avoid confusion for the source.*

Response: ADEQ agrees with the EPA on this comment. This section has been removed from the permit.

#### HACKBERRY COMPRESSOR STATION

Comment 15: *Attachment B.I.A.2. Opacity Standard. Please remove the test method for opacity to avoid a credible evidence problem, as described in comment # 4 above. Since no opacity observations are required for this source, the test method does not need to be placed elsewhere in the permit.*

Response: ADEQ agrees with the EPA on this comment. The language has been revised as described in the response to comment #4 above.

Comment 16: *Attachment B.I.B.1.a. Open Areas, Roadways, and Streets. Please make the correction described in comment #5 above.*

Response: ADEQ agrees with the EPA on this comment. The language has been revised as described in the response to comment #5 above.

Comment 17: *Attachment B.III. Reporting Requirements. Please make the correction described in comment #12 above.*

Response: ADEQ agrees with the EPA on this comment. Please see revision in response to comment #7 above.

Comment 18: *Attachment B.IV. Testing Requirements. According to the technical support document, a previous permit required annual tests for CO. Please add this requirement, or follow the attached guidance to determine if removal of this condition is possible.*

Response: The most recent performance tests performed in 1997 demonstrate that the emissions of CO for each of the GE turbines was 0.6 lb/hr and 0.2 lb/hr, respectively. In addition, the emissions inventory for the year 1995 reported CO emissions of 13.71 tpy. In the teleconference call of April 23, 1998, EPA agreed that because there is no emission limitation for this pollutant and, based on past performance tests and emissions inventory, this condition can be removed from the permit. As mentioned in the technical support document, we are hereby revising the operating permit through this part 70 renewal process.

## RESPONSIVENESS SUMMARY

To EPA Comments on Proposed Title V Permit  
During Official 45-Day EPA Review Period for

El Paso Natural Gas Company

Alamo Lake Compressor Station (Permit No. 1000164)

Seligman Compressor Station (Permit No. 1000158)

The following comments were made on April 23, 1998 during the official 45-day EPA Review period which ends on May 3, 1998:

### ALAMO LAKE COMPRESSOR STATION

*Comment 1: Attachment B.I.A.2. Natural gas fired GE Turbine Engines. This permit condition limits the GE turbine engine to "40 percent opacity measured in accordance with the Arizona Testing Manual, Reference Method 9". As written, this condition could be read to imply an exclusive link between the emission limit and the method of determining compliance. Conditions in a title V permit cannot limit the types of data or information that may be used to prove a violation of any applicable requirement, i.e., restrict the use of any credible evidence. To correct this credible evidence problem, emission limits should be separated from the required method of monitoring by placing each in its respective section of the permit. Because no Method 9 tests will be required for this facility, simply removing the language referring to Reference Method 9 from the Emission Limits/Standards section will correct this problem.*

**Response:** ADEQ agrees with the EPA on this comment. Condition I.A.2 of Attachment has been revised to read as follows:

"Permittee shall not cause, allow or permit to be emitted into the atmosphere from the GE regenerative gas turbine engine, smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes."

*Comment 2: Attachment B.I.A.4. Natural gas-fired Solar Taurus Turbine Engine. According to the technical support document, the previous permit for this facility (#75013) limited its emissions to 20% opacity. All conditions in installation permits and conditions in operating permits deriving from installation permits are applicable requirements and should be included in the title V permit. Even if there is no clear regulatory requirement for the inclusion of these limits in the underlying permit, they may have been included to keep a source out of certain requirements (NSR, NSPS, etc).*

*However, it may be possible to amend the underlying permit to remove certain obsolete, extraneous or environmentally insignificant conditions. Please see EPA's attached comment on removing applicable conditions from title V by amending the underlying permit. The fuel amount limits need to be included, unless ADEQ can and does modify the underlying permit in accordance with our guidance. Note that if the opacity limit is included, the previous permit should be cited.*

Response: In a teleconference call with Erica Ruhl and Ginger Vagenas of the EPA on April 23, 1998, it was discussed that to remove requirements from previous installation permits, the old permit must be amended concurrently with the Title V permit. In addition, limitations that are being removed from previous permits should be disclosed in the public notice document.

EPA agreed during the teleconference call on April 23, 1998 that because the units burn natural gas, it would be acceptable to remove the opacity limitation. As discussed in the technical support document, we are hereby revising the installation permit through this Part 70 renewal process.

Comment 3: *Attachment B.I.C.1.a. Open areas, Roadways, Streets, Storage Piles or Material Handling. As written, this condition could be read to imply an exclusive link between the emission limit and the method of determining compliance. However, in this case the language linking the emission limit and the test method ("40% opacity measured by EPA Reference Method 9") is a direct quote from the SIP rule. In the context of credible evidence, language in the SIP overrides any permit language, so EPA cannot require a separation of the emission limit and test method. However, the language in the permit should be revised to match the language in the SIP rule exactly. ("40% opacity measured in accordance with the Arizona Testing Manual, Reference Method 9"). We recognize this seems like a minor change, but the language "measured in accordance with" matches the language in the NSPS 40 CFR 60.8 and will improve the enforceability of the permit.*

Response: ADEQ agrees with the EPA on this comment. Condition I.C.1.a of Attachment B has been revised to read as follows:

"Permittee shall not cause, allow or permit visible emissions from open areas, roadways and streets, storage piles or material handling in excess of 40 % opacity, measured in accordance with the Arizona Testing Manual, Reference Method 9."

Comment 4: *Attachment B.II.B. Natural Gas-fired Solar Taurus Turbine Engine. According to the technical support document, the installation permit for this turbine (#75013) required the permittee to measure the total amount of natural gas consumed and document daily fuel use. This requirement should be included, unless ADEQ amends the underlying permit according to the attached guidance.*

Response: In a teleconference call with Erica Ruhl and Ginger Vagenas of the EPA on April 23, 1998, it was discussed that to remove requirements from previous installation permits, the old permit must be amended concurrently with the Title V permit. In addition, limitations that are being removed from previous permits should be disclosed in the public notice document.

The technical support document has been revised to include a discussion pertaining to the removal of the fuel limitation requirement. As mentioned in the technical support document, we are hereby revising the installation permit through this Part 70 renewal process.

Comment 5: *Attachment B.III. Reporting Requirements. Reports of required monitoring must be submitted every 6 months, pursuant to A.A.C. R18-2-306.A.5.a. As described in the preamble to 40 CFR Part 70, these reports must include all recordkeeping performed in place of monitoring, i.e., (for this permit) records of dust control measures required by Section II.F.1. Please add a new provision (III.B.3) requiring the Permittee to submit a report, at least every 6 months, of all records required under Section II.B. This citation for the new condition should be A.A.C. R18-2-306.A.5.a. For convenience, this requirement may be timed to coincide with the compliance certifications required by Section VII of Attachment A.*

Response: ADEQ agrees with the EPA on this comment. A new condition III.C has been added to the permit. Section III.C reads as follows:

“At the time the compliance certifications required by Section VII of Attachment “A” are submitted, the Permittee shall submit reports of all monitoring activities required by Section II of this Attachment performed in the six months prior to the date of the report.”

#### SELIGMAN COMPRESSOR STATION

Comment 6: *Attachment B. The numbering convention used in Attachment B starts out with XXI, XXII, and XXIII, but is followed by IV. Please correct this to avoid confusion. Also, note that if the "XX..." numbering system is used, several sections of the permit need to be changed to reflect the new numbering.*

Response: ADEQ has corrected the typographical errors. The numbering system in Attachment B should read as I, II, III, and IV.

Comment 7: *Attachment B. XXI.A.2. Although the NSPS Subpart GG requirements were included in a previous permit by error, they are applicable requirements and must be removed from the underlying permit in accordance with our attached guidance if they are to be excluded from the Title V permit. Such an amendment to the*



*underlying permit should be clearly documented in the technical support document of this permit. Also, please correct Section XXI.A.2 as described in comment #1.*

**Response:** In a teleconference call with Erica Ruhl and Ginger Vagenas of the EPA on April 23, 1998, it was discussed that to remove requirements from previous installation permits, the old permit must be amended concurrently with the Title V permit. In addition, limitations that are being removed from previous permits should be disclosed in the public notice document.

The technical support document has been revised to include a discussion pertaining to the removal of the NSPS Subpart GG requirements. As mentioned in the technical support document, we are hereby revising the installation permit through this Part 70 renewal process.

The typographical error has been corrected as stated in the response to comment #7. Condition I.A.2 of Attachment has been revised to read as follows:

"Permittee shall not cause, allow or permit to be emitted into the atmosphere from the stationary gas turbine engine, smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. "

**Comment 8:** *Attachment B.XXI.B.1.a. Please make the correction described in the comment #3 above.*

The typographical error has been corrected as stated in Comment 7. ADEQ agrees with the EPA on this comment. Condition I.B.1.a of Attachment B has been revised to read as follows:

"Permittee shall not cause, allow or permit visible emissions from open areas, roadways and streets, storage piles, and material handling in excess of 40% opacity, measured in accordance with the Arizona Testing Manual, Reference Method 9."

**Comment 9:** *Attachment B.XXIII. Please make the correction described in the comment #5 above.*

The typographical error has been corrected as stated in Comment 7. ADEQ agrees with the EPA on this comment. A new condition III.C has been added to the permit. Section III.C reads as follows:

"At the time the compliance certifications required by Section VII of Attachment "A" are submitted, the Permittee shall submit reports of all monitoring activities required by Section II of this Attachment performed in the

six months prior to the date of the report.”